

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

IN RE:	}	CASE NO:	16-31644-DHW
James Jan Morrison	}	CHAPTER:	13
Debtor(s)	}		
Soc.Sec.No(s): xxx-xx-6191	}		

RESPONSE TO DEBTOR'S OBJECTION TO CLAIM 6
FILED BY REGIONS BANK DBA REGIONS MORTGAGE

Comes now REGIONS BANK DBA REGIONS MORTGAGE its principals, investors, successors, and/or assigns, if any, (hereinafter "Creditor"), by and through its undersigned counsel of record, Sirote & Permutt, P.C., and hereby Responds to the Debtor's Objection to Claim 6 and seeks an order by this Honorable Court allowing said claim as filed; and in support thereof, the Creditor avers as follows:

1. The Debtor has objected to Claim 6 upon the belief that the claim was amended on December 16, 2016 to include \$650 in post-petition fees associated with preparing the claim. However, the objection is misplaced as the claim was not amended. Rather a Notice of Post-petition Fees and expenses was filed on Dec. 16, 2016. Therefore, Claim 6 should be allowed as filed.
2. In response to Debtor's objection to the fees associated with the preparing and filing of the proof of claim, the Creditor avers that the fees are reasonable for the amount of time and work needed to follow the bankruptcy rules and code provisions and protect their interests in a consumer bankruptcy case.

WHEREFORE, ABOVE PREMISES CONSIDERED, the Creditor herein prays that this Honorable Court will allow Claim 6 as filed and overrule any other objections to the post-petition fees and expenses.

Respectfully submitted,



Enslen Crowe (CRO-098)
Attorney for Creditor

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CERTIFICATE OF SERVICE

I hereby certify in accordance with Fed. R. Bankr. P. 4001(a), 9014, and 7004 that a copy of the above and foregoing Response to Debtor's Objection to Claim was mailed, first class postage prepaid to the following:


James Jan Morrison
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and served via electronic case management to:

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On this the 2nd day of Feb, 2017.


OF COUNSEL